

1 ROBERT W. FREEMAN  
Nevada Bar No. 3062  
2 [Robert.Freeman@lewisbrisbois.com](mailto:Robert.Freeman@lewisbrisbois.com)  
E. MATTHEW FREEMAN  
3 Nevada Bar No. 14198  
[Matt.Freeman@lewisbrisbois.com](mailto:Matt.Freeman@lewisbrisbois.com)  
4 LEWIS BRISBOIS BISGAARD & SMITH LLP  
6385 S. Rainbow Boulevard, Suite 600  
5 Las Vegas, Nevada 89118  
702.893.3383  
6 FAX: 702.893.3789  
Attorneys for Defendants  
7 Las Vegas Metropolitan Police  
Department  
8 Officer Michael Souder

9  
10 **UNITED STATE DISTRICT COURT**  
11 **DISTRICT OF NEVADA, SOUTHERN DIVISION**

12 \*\*\*

13 DONNELL RICHARD REID II, an  
Individual;

14 Plaintiff,

15 vs.

16 DARREN PHILLIPS, an individual; M.  
17 SOUDER, in his individual and official  
capacity, THE LAS VEGAS  
18 METROPOLITAN POLICE DEPARTMENT,  
DOE Defendants XI through XX, in their  
19 individual and official capacity;

20 Defendants.

CASE NO. 2:19-cv-02035-KJD-BNW

**STIPULATION AND ORDER TO  
EXTEND THE DEADLINE FOR THE  
PARTIES TO FILE THEIR PRE-TRIAL  
MOTIONS**

**FIRST REQUEST**

21  
22 Pursuant to LR 6-1 and LR 26-4, by and through Plaintiff, Donnell Richard Reid, II and  
23 Defendants the Las Vegas Metropolitan Police Department and Officer M. Souder, and their  
24 respective counsel of record, hereby stipulate and request that this Court extend the deadline to file  
25 Pre-Trial Motions in the above-captioned case sixty days (60) days, up to and including June 7,  
26 2021.

27 This Request for an extension of time is not sought for any improper purpose or other  
28 purpose of delay. This request for extension is based upon the following:

1 Counsel for Defendant is preparing for and attending multiple unilaterally set depositions  
2 in Stewart v. Henderson, Eighth Judicial District Court Case Number A-17-762544-C.

3 WHEREFORE, the parties respectfully request that this Court extend the time for the  
4 parties to file their Pre-Trial Motions by sixty (60) days from the current deadline of April 7, 2021  
5 up to and including June 7, 2021.

6 DATED this 17<sup>th</sup> day of March, 2021.

DATED this 17<sup>th</sup> day of March, 2021.

7 LEWIS BRISBOIS BISGAARD & SMITH

E. BRENT BRYSON, LTD.

8 /s/ Robert W. Freeman

/s/ E. Brent Bryson

9 ROBERT W. FREEMAN

E. BRENT BRYSON

Nevada Bar No. 3062

Nevada Bar No. 4933

10 E. MATTHEW FREEMAN

3202 West Charleston Blvd.

Nevada Bar No. 14198

Las Vegas, Nevada 89102

11 6385 S. Rainbow Blvd, Suite 600

*Attorneys for Plaintiff*

Las Vegas, Nevada 89118

12 *Attorneys for the Defendants*

*Las Vegas Metropolitan Police Department*

13 *Officer Michael Souder*

14  
15 **ORDER**

16 **IT IS SO ORDERED**

17 **DATED:** 10:31 am, March 19, 2021

18 

19 **BRENDA WEKSLER**

20 **UNITED STATES MAGISTRATE JUDGE**